

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MAZLIN TRADING CORP. & SHIREEN MARITIME
LTD,

Plaintiffs,

-against-

**CERTIFICATION OF MICHAEL
J. SMIKUN IN SUPPORT OF
ORDER TO SHOW CAUSE**

Civil Action No. _____

WJ HOLDING LTD & STRUBRIK LIMITED,
Defendants.

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I, MICHAEL J. SMIKUN, of full age, declare the following under penalty of perjury:

1. I am an attorney-at-law in the State of New York and a partner at Callagy Law, P.C., attorneys for Petitioners Mazlin Trading Corp. and Shireen Maritime Ltd., in the above-captioned matter.

2. I make this certification in support of Petitioners' order to show cause. I am fully and personally familiar with all facts set forth herein.

3. Attached hereto as **Exhibit 1** are true and correct copies of two Final Arbitration Awards entered by the London Court of International Arbitration ("LCIA"). The first (a) is titled "Mazlin Trading Corp., Claimant – and – (1) WJ Holding Limited (2) Stubrick Limited, Respondents, Final Award, Dated 23 January 2018," with LCIA Arbitration No. 163503. The second (b) is titled "(1) Shireen Maritime Limited (2) Mazlin Trading Corp., Claimants – and – (1) WJ Holding Limited (2) Stubrick Limited, Respondents, Final Award, Dated 23 January 2018," with LCIA Arbitration No. 173638.

4. Attached hereto as **Exhibit 2** is a true and correct copy of a certified English translation of a world-wide injunction issued by the District Court of Nicosia, Application No. 479/16.

5. Attached hereto as **Exhibit 3** is a true and correct copy of a Final Arbitration Award entered by the International Chamber of Commerce titled “WJ Holding Limited (Cyprus), Claimant and Transdniestrian Moldovan Republic (Moldova), Respondent, Final Award, 6 June 2018,” with ICC Case No. 21717/MHM.

6. Attached hereto as **Exhibit 4** is a true and correct copy of a Petition to Recognize and Enforce Foreign Arbitration Award styled *WJ Holding Limited v. Transdniestrian Moldovan Republic et al*, in the U.S. District Court for S.D.N.Y., Case No.: 19-cv-06260.

7. Attached hereto as **Exhibit 5** are true and correct copies of (a) a mortgage contract dated December 11, 2016; (b) multiple images taken of documents and webpages showing properties listed for sale; (c)(1) two contracts for sale of shares in a company named BVDH Real Estate Utilization Ltd. and (c)(2) a private investigation report regarding one of the purchasers of 70% shares of BVDH Real Estate Utilization Ltd. named Evgeney Schreiber; and (d) a contract for sale of property in Budapest.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Respectfully submitted,

CALLAGY LAW, P.C.

By: /s/Michael J. Smikun, Esq.
Michael J. Smikun, Esq.
Attorneys for Petitioners

Dated: Paramus, New Jersey
August 15, 2019